

1 **HILL, FARRER & BURRILL LLP**
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8 Los Angeles, CA 90071-3147
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11
12 Attorneys for Plaintiff/Counter-Defendant
13 CornerStone Staffing Solutions, Inc. and
14 Counter-Defendant Mary Anderson

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1 Plaintiff/Counter-Defendant CORNERSTONE STAFFING SOLUTIONS,
 2 INC. (“CornerStone”) and Defendants/Counter-Claimants LARRY THAXTER
 3 JAMES, DEPLOY HR, INC., HANBON-MI II, INC., and HANBON-CT I, LLC
 4 (“Counterclaimants”), by and through their counsel of record, hereby stipulate as
 5 follows:

6 (1) In order to avoid the uncertainty associated with protracted litigation,
 7 the expense associated therewith, and in order to settle their differences,
 8 CornerStone and Counterclaimants have agreed to a settlement with each other.

9 (2) CornerStone agrees to dismiss the entire complaint with prejudice,
 10 except for its claims against Defendant Larry James, which are the subject of a
 11 separate stipulation and judgment being filed concurrently herewith. The
 12 defendants dismissed with prejudice are David R. Batton, Andre Douzdjian,
 13 Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc.,
 14 Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I,
 15 LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc.,
 16 Deploy HR, Inc.

17 (3) Counterclaimants agree to dismiss all counterclaims in their entirety
 18 with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and
 19 Mary Anderson.

20 (4) The recovery of fees and costs is being addressed in separate
 21 settlement documents.

22 **IT IS SO STIPULATED.**

1 DATED: August 21, 2015

HILL, FARRER & BURRILL LLP

3 By: */s/ Clayton Hix*

CLAYTON J. HIX

4 Attorneys for Plaintiff/Counter-
5 Defendant CORNERSTONE
6 STAFFING SOLUTIONS, INC.; and
7 Counter-Defendant MARY
8 ANDERSON

7 DATED: August 21, 2015

8 SCHEPER, KIM & HARRIS, LLP

9 By: */s/ David Schepers*

10 DAVID SCHEPER

11 Attorneys for Defendant/Counter-
12 Claimant LARRY JAMES and
13 Defendants DEPLOY HR, INC.;
14 DEPLOYHR, INC.; HANBON MI I,
15 LLC; HANBON MI II, INC.; TEC
16 GROUP, INC.; HANBON-CARO,
17 LLC; HANBON-MARLETTE, LLC;
18 HANBON-PA I LLLC

15 DATED: August 21, 2015

16 MORISON & PROUGH, LLP

17 By: */s/ William Morison*

18 WILLIAM C. MORISON

19 Attorneys for Defendant/
20 Counterclaimant HANBON-CT I,
21 LLC

[PROPOSED] ORDER

Pursuant to the foregoing stipulation of the Parties, the Court orders as follows:

(1) The entire complaint is dismissed with prejudice, except for CornerStone's claims against Defendant Larry James, which are the subject of a separate stipulation and judgment. Specifically, the following defendants are dismissed with prejudice: David R. Batton, Andre Douzdjian, Marcos Barrera, Batton Technical Engineering Consultants, Inc., Batton, Inc., Hanbon-Caro I, LLC, Hanbon-MI I, LLC, Hanbon-MI II, Inc., Hanbon-Marlette I, LLC, Hanbon-PA I, LLC, Hanbon-CT I, LLC, TEC Group, Inc., DeployHR, Inc., and Deploy HR, Inc.

(2) All counterclaims are dismissed with prejudice—i.e., all claims against CornerStone Staffing Solutions, Inc. and Mary Anderson.

IT IS SO ORDERED.

Date: 8/21/15


HON. RICHARD SEEBORG
U.S. DIST. COURT JUDGE